



ENTERED  
08/31/2020

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re:

UNIT CORPORATION, *et al.*,

Debtors.<sup>1</sup>

§ Case No. 20-32740 (DRJ)  
§  
§ (Chapter 11)  
§  
§ (Jointly Administered)  
§

**STIPULATION AND AGREED ORDER GRANTING RELIEF  
FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d)**

(Docket Nos. 331 and 360)

This Stipulation and Agreed Order (this “*Stipulation*”) is entered into this 17th day of August, 2020, among MSSE, LLC (“*MSSE*”) and the above-captioned debtors and debtors-in-possession (the “*Debtors*,” and collectively with MSSE, the “*Parties*”), by their respective undersigned counsel, who hereby stipulate and agree as follows:

**WHEREAS**, prior to the commencement of these chapter 11 cases, MSSE commenced an action against multiple defendants, including Debtor Unit Petroleum Company, in the District Court of Dewey County, State of Oklahoma, styled “*MSSE, LLC, a Missouri limited liability company, Plaintiff, v. Unit Petroleum Company, Prairie Oil & Gas, LLC, Prairie O&G Holdings, LLC, and Lockmar Resources, LLC*,” Case Number CV-2019-37 (the “*Action*”).

**WHEREAS**, on May 22, 2020, each of the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “*Bankruptcy Code*”) in the United States Bankruptcy Court for the Southern District of Texas (the “*Court*”). The Debtors’ chapter 11

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<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of their respective federal tax identification numbers are: 8200 Unit Drive, L.L.C. (1376); Unit Corporation (3193); Unit Drilling Colombia, L.L.C. (1087); Unit Drilling Company (5145); Unit Drilling USA Colombia, L.L.C. (0882); and Unit Petroleum Company (5963). The location of the Debtors’ U.S. corporate headquarters and the Debtors’ service address is: 8200 South Unit Drive, Tulsa, Oklahoma 74132.

cases are being jointly administered pursuant to Rule 1015 of the Federal Rules of Bankruptcy Procedure.

**WHEREAS**, the Parties seek an order from the Court modifying the automatic stay of section 362 of the Bankruptcy Code.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, AND UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS ORDERED THAT:**

1. The automatic stay provisions of section 362 of the Bankruptcy Code are hereby modified solely insofar as is necessary to permit MSSE and Unit Petroleum Company to proceed with the Action through and including a final declaratory judgment regarding title to the Subject Mineral Interests defined in MSSE's petition in the Action. Notwithstanding the foregoing, nothing in this Stipulation shall permit MSSE or any other person or entity to seek or recover monetary damages and/or attorneys' fees, costs, or expenses from any of the Debtors without a further Order of this Court.

2. MSSE's *Objection to First Revised Disclosure Statement for the Debtors' First Revised Proposed Joint Chapter 11 Plan of Reorganization [164]* and *Confirmation of Debtors' First Revised Proposed Joint Chapter 11 Plan of Reorganization [163]* [Docket No. 332] is hereby withdrawn, to the extent not otherwise previously withdrawn or overruled by the Court.

3. This Stipulation sets forth the entire understanding of the Parties regarding the subject matter hereof and supersedes all prior oral or written agreements between them regarding the same. This Stipulation shall not be modified, altered, amended, or vacated without written consent of the Parties. Any such modification, alteration, amendment or vacation, in whole or in part, shall be subject to the approval of the Court.

4. Neither this Stipulation, nor any terms contained herein shall be offered or received in evidence or in any way referred to in any legal action or administrative proceeding among or between the Parties, other than as may be necessary: (a) to obtain approval and to enforce this Stipulation and (b) to seek damages or injunctive relief in connection therewith.

5. Neither this Stipulation nor any negotiations and writings in connection with this Stipulation will in any way be construed as or deemed to be evidence of or an admission on behalf of any Party regarding any claim or right that such Party may have against the other Party.

6. Each of the Parties hereto represents and warrants it is duly authorized to enter into and be bound by this Stipulation.

7. The terms and conditions of this Stipulation will be immediately effective and enforceable upon its entry. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Stipulation.

8. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Stipulation, and the Parties hereby consent to such jurisdiction to resolve any disputes or controversies arising from or related to this Stipulation. Any motion or application brought before this Court to resolve a dispute arising from or related to this Stipulation shall be brought on notice as provided by and in accordance with the Federal Rules of Bankruptcy Procedure and the Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas, Houston Division.

Respectfully submitted, agreed to and approved:  
EVANS & MULLINIX, P.A.

/s/ Ryan L. White

Ryan L. White, KS #24337, MO #61863  
*Pro hac vice* in this bankruptcy case  
7225 Renner Road, Suite 200  
Shawnee, KS 66217  
(913) 962-8700; (913) 962-8702 (Fax)  
rwhite@emlawkc.com  
Attorneys for Creditor, MSSE, LLC

Agreed to and approved:

/s/ Matthew J. Pyeatt

**VINSON & ELKINS LLP**

Harry A. Perrin (TX 15796800)  
Paul E. Heath (TX 09355050)  
Matthew J. Pyeatt (TX 24086609)  
1001 Fannin Street, Suite 2500  
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hperrin@velaw.com; pheath@velaw.com; mpyeatt@velaw.com

- and -

David S. Meyer (admitted *pro hac vice*)  
Lauren R. Kanzer (admitted *pro hac vice*)  
1114 Avenue of the Americas, 32nd Floor  
New York, NY 10036  
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Fax: 212.237.0100  
dmeyer@velaw.com; lkanzer@velaw.com

**ATTORNEYS FOR THE DEBTORS  
AND DEBTORS IN POSSESSION**

**IT IS SO ORDERED.**

Signed: August 31, 2020.



DAVID R. JONES  
UNITED STATES BANKRUPTCY JUDGE

United States Bankruptcy Court  
Southern District of TexasIn re:  
Unit Corporation  
Unit Petroleum Company  
DebtorsCase No. 20-32740-drj  
Chapter 11

## CERTIFICATE OF NOTICE

District/off: 0541-4

User: aalo  
Form ID: pdf002Page 1 of 3  
Total Noticed: 58

Date Rcvd: Aug 31, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 02, 2020.

db +8200 Unit Drive, L.L.C., 8200 South Unit Drive, Tulsa, OK 74132-5300  
 db +Unit Corporation, 8200 South Unit Drive, Tulsa, OK 74132-5300  
 db +Unit Drilling Colombia, L.L.C., 8200 South Unit Drive, Tulsa, OK 74132-5300  
 db +Unit Drilling Company, 8200 South Unit Drive, Tulsa, OK 74132-5300  
 db +Unit Drilling USA Colombia, L.L.C., 8200 South Unit Drive, Tulsa, OK 74132-5300  
 db +Unit Petroleum Company, 8200 South Unit Drive, Tulsa, OK 74132-5300  
 aty Christine R. Etheridge, IKON Financial Services, 1738 Bass Road, P.O.Box 13708, Macon,, GA 31208-3708  
 aty +John I. Wassberg, 8601 Ash Lane, Prairie Village, KS 66207-1730  
 cr +A2D Technologies, Inc., d/b/a TGS Geological Produ, c/o Andrew A Braun, Suite 4800, 701 Poydras Street, 701 Poydras Street, New Orleans, LA 70139-7756  
 cr +Andrews Independent School District, et al, C/O Laura J. Monroe, Perdue, Brandon, Fielder, Collins & Mott, PO Box 817, Lubbock, TX 79408-0817  
 cr +Bank of America, N.A., 901 Main Street, 64th Floor, Dallas, TX 75202-3738  
 cr +Canadian Independent School District c/p, Perdue Brandon Fielder Collins & Mott, PO Box 9132, Amarillo, TX 79105-9132  
 pla +Chieftain Royalty Company, c/o John D. Gaither, Neligan LLP, 325 N. St. Paul, Suite 3600, Dallas, TX 75201-3833  
 cr +Citation 2004 Investment, LLC, c/o Christopher Staine, Crowe & Dunlevy, PC, 2525 McKinnon Street, Suite 425, Dallas, TX 75201-1543  
 cr +Citation Oil & Gas Corp., c/o Christopher M. Staine, Crowe & Dunlevy, PC, 2525 McKinnon Street, Suite 425, Dallas, TX 75201-1543  
 cr +Coastal Strategies Income Fund A, 583 Fairfield Road, Simi Valley, CA 93065-6909  
 pla +Cockerell Oil Properties, Ltd., Neligan LLP, 325 N. St. Paul, Suite 3600, Dallas, TX 75201-3833  
 cr +Coleman County TAD, Linebarger Goggan Blair & Sampson, c/o Elizabeth Weller, 2777 N Stemmons Frwy Ste 1000, Dallas, TX 75207-2328  
 cr #+GeoSouthern Energy Corporation, c/o Holly C.Hamm, Snow Spence Green LLP, 2929 Allen Parkway, Suite 2800, Houston, TX 77019-7125  
 cr +Hardin County, c/o Tara LeDay, Po Box 1269, Round Rock, TX 78680-1269  
 intp +Hunton Andrews Kurth LLP, Attn: Ashley L. Harper, 600 Travis St, Suite 4200, Houston, TX 77002-2929  
 cr +J-W Power Company, c/o Miller Mentzer Walker, P.C., P.O. Box 130, 100 N. Main St, Palmer, tx 75152-9538  
 cr +Jo Katherin Dargel, C/o Juan M. Pequeno, Jr., PO Drawer 1247, Weslaco, TX 78599-1247  
 cr +Jo Knox Katherin, C/o Juan M. Pequeno, Jr., PO Drawer 1247, Weslaco, TX 78599-1247  
 cr +Merrill Lynch Commodities Inc., 901 Main Street, 64th Floor, Dallas, TX 75202-3738  
 cr +Michael Gilmore, Law Office of Thomas J. Henry, P.O. Box 696025, San Antonio, TX 78269, UNITED STATES 78269-6025  
 cr +Michael Peters, Stringfellow Unit -CID, 1200 FM 655, 2019190, Rossharon, TX 77583-8602  
 cr Midland CAD, c/o Tara LeDay, P. O. Box 1269, Round Rock, TX 78680-1269  
 cr +Oklahoma County Treasurer, c/o Tammy Jones, 320 Ribert S. Kerr, Room 307, Oklahoma City, OK 73102-3441  
 cr +Oracle America, Inc., Buchalter PC, Shawn M. Christianson, 55 22nd St., 17th Fl., San Francisco, Ca 94107  
 op +Prime Clerk LLC, Prime Clerk LLC, 60 E 42nd St Ste 1440, New York, NY 10165-1446  
 intp Railroad Commission of Texas, c/o Office of the Attorney General, Bankruptcy & Collections Division, P. O. Box 12548, Austin, TX 78711-2548  
 cr +Seitel Data, Ltd., c/o Duane J. Brescia, Clark Hill Strasburger, 720 Brazos, Suite 700, Austin, TX 78701-2531  
 cr +Teocalli Exploration LLC, 6608 N Western Avenue, #404, Oklahoma City, OK 73116, UNITED STATES 73116-7326  
 cr Texas Comptroller of Public Accounts, Revenue Acco, Kimberly A. Walsh, PO Box 12548, Austin, TX 78711-2548  
 intp Texas Comptroller of Public Accounts, Unclaimed Pr, c/o Attorney General's Office, Bankruptcy & Collections Division, P. O. Box 12548 MC-008, Austin, TX 78711-2548  
 cr Texas Taxing Authorities, c/o Tara LeDay, P.O. Box 1269, Round Rock, TX 78680-1269  
 cr +Texas Taxing Entities c/o, Perdue Brandon Fielder Collins & Mott, PO Box 9132, Amarillo, TX 79105-9132  
 cr +Tom Green CAD, Linebarger Goggan Blair & Sampson, c/o Elizabeth Weller, 2777 N Stemmons Frwy Ste 1000, Dallas, TX 75207-2328  
 cr +Ward County, 112 E Pecan Street, Suite 2200, San Antonio, TX 78205-1588  
 intp +Westerngeco LLC, c/o Andrew A Braun, Geiger Laborde & Laperouse, LLC, Suite 4800, 701 Poydras Street, New Orleans, LA 70139-7756  
 cr +Williford Energy Company, Frederic Dorwart, Lawyers PLLC, 124 E. Fourth Street, TULSA, OK 74103-5027

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

cr E-mail/Text: Customer.Bankruptcy@Archrock.com Aug 31 2020 22:03:38  
 Archrock Partners Operating LLC, 9807 Katy Frwy, Ste. 100, Houston, TX 77024  
 cr E-mail/Text: houston\_bankruptcy@LGBS.com Aug 31 2020 22:04:30 Cypress-Fairbanks ISD,  
 Linebarger Goggan Blair & Sampson LLP, C/O Tara L. Grundemeier, P.O. Box 3064,  
 Houston, TX 77253-3064

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(continued)

cr +E-mail/Text: houston\_bankruptcy@LGBS.com Aug 31 2020 22:04:30 Harris County,  
Linebarger Goggan Blair & Sampson LLP, c/o Tara L. Grundemeier, P.O. Box 3064,  
Houston, TX 77253-3064

cr +E-mail/Text: houston\_bankruptcy@LGBS.com Aug 31 2020 22:04:30 Jasper County,  
Linebarger Goggan Blair & Sampson LLP, c/o Tara L. Grundemeier, P.O. Box 3064,  
Houston, TX 77253-3064

cr E-mail/Text: houston\_bankruptcy@LGBS.com Aug 31 2020 22:04:30 Jefferson County,  
Linebarger Goggan Blair & Sampson LLP, c/o Tara L. Grundemeier, Post Office Box 3064,  
Houston, TX 77253-3064

cr +E-mail/Text: pwp@pattiprewittlaw.com Aug 31 2020 22:04:21 Kinder Morgan Treating, LP,  
c/o Law Ofc Patricia Williams Prewitt, 10953 Vista Lake Ct., Navasota, TX 77868,  
UNITED STATES 77868-6981

cr E-mail/Text: houston\_bankruptcy@LGBS.com Aug 31 2020 22:04:30 Liberty County,  
Linebarger Goggan Blair & Sampson LLP, c/o Tara L. Grundemeier, PO BOX 3064,  
Houston, TX 77253-3064

cr E-mail/Text: houston\_bankruptcy@LGBS.com Aug 31 2020 22:04:30 Matagorda County,  
Linebarger Goggan Blair & Sampson LLP, c/o Tara L. Grundemeier, PO BOX 3064,  
Houston, TX 77253-3064

op +E-mail/Text: jeremiah.buettner@mcafeetaft.com Aug 31 2020 22:05:01  
McAfee & Taft A Professional Corporation, Two Leadership Square, Tenth Floor,  
211 N. Robinson, Oklahoma City, OK 73102, UNITED STATES 73102-7109

cr E-mail/Text: houston\_bankruptcy@LGBS.com Aug 31 2020 22:04:30 Montgomery County,  
Linebarger Goggan Blair & Sampson LLP, c/o Tara L. Grundemeier, P.O. Box 3064,  
Houston, TX 77253-3064

cr +E-mail/PDF: PRA\_BK2\_CASE\_UPDATE@portfoliorecovery.com Aug 31 2020 22:16:32  
PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541-1021

cr +E-mail/Text: houston\_bankruptcy@LGBS.com Aug 31 2020 22:04:30 Palacios ISD,  
c/o Tara L. Grundemeier, Linebarger Goggan Blair & Sampson LLP, P.O. Box 3064,  
Houston, Tx 77253-3064

cr E-mail/Text: houston\_bankruptcy@LGBS.com Aug 31 2020 22:04:30 Polk County,  
Linebarger Goggan Blair & Sampson LLP, c/o Tara L. Grundemeier, PO BOX 3064,  
Houston, TX 77253-3064

cr E-mail/Text: houston\_bankruptcy@LGBS.com Aug 31 2020 22:04:30 Shelby County,  
Linebarger Goggan Blair & Sampson LLP, c/o Tara L. Grundemeier, PO BOX 3064,  
Houston, TX 77253-3064

cr +E-mail/Text: james.devitt@la.gov Aug 31 2020 22:04:59  
State of Louisiana, Department of Natural Resource, 617 North Third Street,  
Baton Rouge, LA 70802-5432

cr +E-mail/Text: houston\_bankruptcy@LGBS.com Aug 31 2020 22:04:30 Tyler County,  
Linebarger Goggan Blair & Sampson LLP, c/o Tara L. Grundemeier, P.O. Box 3064,  
Houston, TX 77253-3064

TOTAL: 16

\*\*\*\*\* BYPASSED RECIPIENTS (undeliverable, \* duplicate) \*\*\*\*\*

aty Robert D Loventhal  
intp Ad Hoc Group of Certain Noteholders  
cr BOKF, N.A.  
cr BP America Production Company  
cr Borets US, Inc.  
cr DeWitt County  
cr Enable Gathering & Processing, LLC  
cr Enable Midstream Partners, LP  
cr Enterprise GC LLC  
cr Goliad County  
cr Goliad ISD  
cr Humble Independent School District  
cr Lavaca County  
cr Live Oak CAD  
cr MSSE, LLC  
cr USA Compression Partners, LLC  
cr USAC OpCo 2, LLC  
cr United States of America  
cr Veritas Land Surveys, a division of Veritas DGC La  
cr Vernon E. Faulconer, Inc.  
intp Wayne Smith  
cr Webb CISD  
cr Wells Fargo Vendor Financial Services, LLC  
cr Westchester Fire Insurance Company  
intp Wilmington Trust, National Association in its capa  
cr Yoakum ISD

TOTALS: 26, \* 0, ## 0

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USPS regulations require that automation-compatible mail display the correct ZIP.

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\*\*\*\*\* BYPASSED RECIPIENTS (continued) \*\*\*\*\*

Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update. While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Sep 02, 2020

Signature: /s/Joseph Speetjens

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### CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 31, 2020 at the address(es) listed below:  
NONE.

TOTAL: 0